

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Edward Stewart

vs.

David Feldman, *et al.*

Civil Action  
No. 20-776

**PLAINTIFF'S MOTION TO COMPEL**

Defendants have not responded to Plaintiff's Second Set of Requests for Production. Responses are now 21 days overdue.

1. On October 22, 2020, Plaintiff propounded a Second Set of Requests for Documents.
2. Responses were due on the next business day 30 days later, on November 23, 2020.
3. 21 days after the deadline, Defendants still have not provided responses.
4. Under FED. R. CIV. P. 37(a)(1), this Court may compel production.

WHEREFORE, Plaintiff Edward Stewart asks this Court to respond to Plaintiff's Second Set of Requests for Production and produce all responsive documents.

Respectfully submitted,

/s/ Daniel J. Auerbach  
Daniel J. Auerbach (PA I.D. No. 316856)  
1500 John F. Kennedy Blvd., Suite 1203  
Philadelphia, PA 19102  
(215) 567-1486  
dan@gamburglaw.com

Dated: December 14, 2020